

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
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DATE FILED: 12/6/2019

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UNITED STATES OF AMERICA :
:
- v. - : **PROTECTIVE ORDER**
:
ZHONGSAN LIU, : 19 Cr. 804 (VEC)
:
Defendant. :
:
- - - - - X

VALERIE E. CAPRONI, District Judge:

WHEREAS, ZHONGSAN LIU, the defendant, has certain rights under the United States Constitution, federal statutes, and the Federal Rules of Criminal Procedure, to pre-trial discovery;

WHEREAS, the Government recognizes its obligation to provide such discovery materials to the defendant, consistent with safety and privacy considerations and the confidentiality of ongoing investigations;

WHEREAS, the discovery materials that the Government intends to provide to the defendant contain certain materials that, if disseminated to third parties, could, among other things, implicate the safety and privacy of others and impede ongoing investigations;

WHEREAS, in the interest of expediting the discovery process, the undersigned defendant and his counsel, Valerie Wong, Esq., consent to the entry of this Order;

IT IS HEREBY ORDERED that, pursuant to Federal Rule of Criminal Procedure 16(d) and subject to the additional limitations set forth below, the discovery materials provided by the Government to Valerie Wong, Esq., shall not be further disseminated by the defendant or his counsel to any individuals, organizations or other entities, other than members of the defense team (limited to: co-counsel, paralegals, investigators, translators, litigation support personnel, secretarial staff, defense experts, and the defendant);

IT IS FURTHER ORDERED that the discovery materials may not be provided to any foreign persons or entities (even if such persons or entities are members of the defense team), with the exception of the defendant and foreign paralegals employed by Wong, Wong & Associates, P.C., who may be provided the discovery materials;

IT IS FURTHER ORDERED that the discovery materials may not be transmitted outside of the United States for any purpose;

IT IS FURTHER ORDERED that each of the individuals to whom disclosure of the discovery materials is made shall be provided a copy of this Protective Order by defense counsel and will be advised by defense counsel that he or she shall not further disseminate or discuss the materials and must follow the terms of this Protective Order;

IT IS FURTHER ORDERED that defense counsel may seek

authorization of the Court, with notice to the Government, to show (but not provide copies of) certain specified discovery materials to persons whose access to discovery materials is otherwise prohibited by the preceding paragraphs, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case;

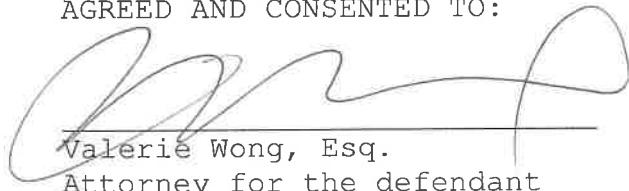
IT IS FURTHER ORDERED that all discovery materials are to be provided to the defendant, and used by the defense team, solely for the purpose of allowing the defendant to prepare his defense to the charge in the Indictment, and that none of the discovery materials produced by the Government to the defendant shall be disseminated to any other third party in a manner that is inconsistent with the preceding paragraphs;

IT IS FURTHER ORDERED that, at the conclusion of this case, defense counsel shall return to the Government all copies of the discovery materials provided in this case;

IT IS FURTHER ORDERED that nothing in this Order prohibits the media from requesting copies of any items that are received by the Court as public exhibits at a hearing, trial, or other proceeding; and

IT IS FURTHER ORDERED that nothing in this Order shall preclude the Government from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery material.

AGREED AND CONSENTED TO:



Valerie Wong, Esq.
Attorney for the defendant

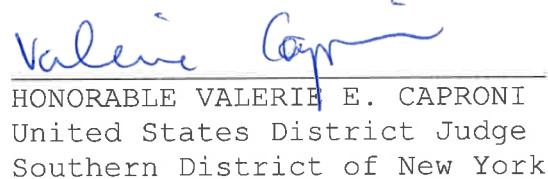
12/03/2019
Date



ZHONGSAN LIU

12/03/2019
Date

SO ORDERED:



HONORABLE VALERIE E. CAPRONI
United States District Judge
Southern District of New York

12/6/2019
Date